

Case 1:17-cv-08234-LAK Document 19 Filed 11/21/17 Page 1 of 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

INTER-MARKETING GROUP USA, INC.,)
individually and on behalf of all others)
similarly situated,)
Plaintiff,)
v.) Case No. 1:17-cv-08234-LAK
CENTURYLINK, INC., GLEN F. POST, III,)
R. STEWART EWING, JR., and DAVID D.)
COLE,)
Defendants,)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED DEC 13 2017

MEMO ENDORSED

**NOTICE OF MOTION AND MOTION TO TRANSFER VENUE
UNDER 28 U.S.C. § 1404(A) TO THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Please take notice that Defendants CenturyLink, Inc., Glen F. Post, III, R. Stewart Ewing, Jr., and David D. Cole hereby move this Court for an order transferring venue in this action to the Monroe Division of the United States District Court for the Western District of Louisiana under 28 U.S.C. § 1404(a). In support of this Motion, Defendants include a Memorandum of Law, a Declaration of Guy E. Miller, III and a Declaration of Lyle Roberts with attached exhibit.

Dated: November 21, 2017

Respectfully submitted,

COOLEY LLP

/s/ Lyle Roberts

Lyle Roberts (*pro hac vice*)

George Anhang

1299 Pennsylvania Avenue, NW

MEMO ENDORSED

Memorandum Endorsement Inter-Marketing Group USA, Inc. v. CenturyLink, Inc., 17-cv-8234 (LAK)

The motion to transfer this action to the United States District Court for the Western District of Louisiana, pursuant to 28 U.S.C. 1404(a), in the interest of justice and for the convenience of the parties and witnesses is granted. The court finds no merit at all to plaintiff's assertion that the lead counsel issue ought to be resolved here prior to transferring, as the Louisiana court already is involved in closely related litigation and is better suited to managing all of the litigation in the most expeditious, efficient and effective manner. Notably, plaintiff does not argue that a transfer to that court would be inappropriate.

SO ORDERED.

Dated: December 13, 2017

/s/ Lewis A Kaplan

Lewis A. Kaplan

United States District Judge